

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

Pacific Packaging Products, Inc.)	
Plaintiff)	
)	
v.)	
)	
Baldwin & Clarke,)	Civil Action No.: 04-CV-11102MLW
Jefferson Pilot Securities Corp.,)	
Benefit Strategies, LLC,)	
Michael J. Kennedy, and)	
Scott D. LaValley)	
Defendants)	
)	

FOURTH MOTION OF PLAINTIFF TO EXTEND TIME TO RESPOND
TO MOTION OF THE DEFENDANTS, BALDWIN & CLARKE,
JEFFERSON PILOT SECURITIES CORP., MICHAEL J. KENNEDY
AND SCOTT D. LAVALLEY TO DISMISS
WITH ASSENT OF ALL DEFENDANTS COUNSEL

Now comes the Plaintiff, Pacific Packaging Products, Inc., with the assent of all Defendants counsel, and requests this Court grant it an extension of time to respond to the Motion to Dismiss filed by the Defendants up to and including November 23, 2004 As a basis, the Plaintiff states:

1. The parties have been actively discussing a resolution of this matter;
2. Due to the conflicting schedules of counsel and clients, the parties have been unable to execute necessary documents to finalize the resolution that has been reached between all parties.

Dated: September 23, 2004

Respectfully Submitted,
Pacific Packaging Products, Inc.
By Their Attorneys,

/s/ Lora M. McSherry
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Assented to by the Attorneys for
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Pilot Securities Corp., Michael J.
Kennedy and Scott D. LaValley

/s/ Mark B. Dubnoff
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Assented to by the Attorneys for
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/s/ Anthony S. Augeri
Anthony S. Augeri
William Glahn
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CERTIFICATE OF SERVICE

I, Lora M. McSherry, hereby certify that on this 23rd day of September, 2004, I caused a copy of the foregoing document to be sent by first-class mail, postage prepaid, to Defendant s counsel, John Hughes, Esq, Edwards & Angell, LLP, 101 Federal Street, Boston, MA 02110 and Anthony S. Augeri, Esq. and William Glahn, Esq. McLane, Graf, Raulerson & Middleton, 900 Elm Street P.O. Box 326 Manchester, NH 03105-0326

/s/ Lora M. McSherry
Lora M. McSherry